long comment, mandating copy-protection is one of the stupidest things you could do. If you want people to switch over to ATSC at all, this will not help things along. In fact it will only hamper the transition because people (normal consumers, not the pirates, who will eventually figure a way around any copy-protection anyway) will see the inability to record certain shows (for time-shifting purposes) as a huge reason NOT to switch.

a quote from your own document:

"The FCC said that the current lack of digital broadcast copy protection may be a key impediment to the DTV transition's progress. Without a digital copy protection scheme that prevents the unauthorized copying and redistribution of digital media, programming content providers assert that they will not permit the digital broadcast of high quality programming.

Without such programming, consumers may be reluctant to

Without such programming, consumers may be reluctant to buy DTV receivers and equipment, thereby delaying the DTV transition." exactly. whether or not the broadcasters actually provide any high quality content (assuming they mean broadcast at HD resolution) is not a huge problem to most people.